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signature pages]*

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

MDL No. 3047

Case No.: 4:22-md-03047-YGR

This Document Relates To:

*ALL ACTIONS*

**OMNIBUS SEALING STIPULATION  
REGARDING (1) DECEMBER 17, 2025  
ORDER RE FURTHER INFORMATION  
RE META'S MOTION FOR PROTECTIVE  
ORDER (ECF 2581) (SEALED) AND (2)  
DECLARATION OF ASHLEY M.  
SIMONSEN IN RESPONSE (ECF 2594-1)  
AND EXHIBITS THERETO**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5 and this Court's Order Setting Sealing Procedures ("Sealing Protocol") (ECF 341), Plaintiffs and Meta submit this Omnibus Sealing Stipulation regarding (1) the Court's December 17, 2025 Order re Further Information re Meta's Motion for Protective Order (ECF 2581) (sealed)<sup>1</sup> and (2) the Declaration of Ashley M. Simonsen in response thereto (ECF 2594-1) and exhibits thereto (ECF 2594-2-4) (listed in the chart below).

Meta seeks to seal in certain of these filings only the names of non-executive (i.e., below Vice-President level) current and former Meta employees. Plaintiffs do not oppose the redaction of those names in these filings. The Parties agree that the filings otherwise need not be maintained under seal.

The chart below sets forth Meta's proposed redactions to these filings, which are undisputed. Pursuant to the Sealing Protocol and CMO 28,<sup>2</sup> a Proposed Order implementing this Stipulation, attaching copies of the filings with only the redactions listed below, is filed herewith.

Filing	Portion to be Redacted/Sealed	Basis for Sealing	Whether Previously Sealed
Declaration of Ashley M. Simonsen in Response to December 17, 2025 Order re Further Information re Meta's Motion for Protective Order (ECF 2594-1) ("Simonsen Declaration")	Names of non-executive employees (appearing at location of redactions in version of filing attached to Proposed Order filed herewith)	There is good cause to seal the names of non-executive employees to protect their privacy interests. <i>See, e.g., Murphy v. Kavo Am. Corp.</i> , 2012 WL 1497489, at *1 (N.D. Cal. Apr. 27, 2012) (Gonzalez Rogers, J.) (granting motion to seal "employee-identifying information" because "[e]mployees and former employees who are not parties to this litigation have privacy interests in their personnel information, and in other sensitive identifying	This Court has previously granted motions to seal the names of non-executive employees to protect their privacy. <i>See</i> ECF 735, 189, 1465, 1619, 2522.

<sup>1</sup> The Court designated the December 17, 2025 Order as Confidential under the Protective Order and thus directed the Clerk of Court to file it under seal. ECF 2581 at 2. Meta has determined that, other than non-executive employee names, the Order does not require sealing.

<sup>2</sup> In CMO 28, the Court directed the Parties to unseal information "immediately once the parties agree that a document, or information redacted from a document, should not be sealed." ECF 2336 at 2.

		information”); <i>see also</i> , e.g., <i>Am. Auto. Ass’n of N. California, Nevada &amp; Utah v. Gen. Motors LLC</i> , 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019); <i>Opperman v. Path, Inc.</i> , 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017); <i>Hunt v. Cont’l Cas. Co.</i> , 2015 WL 5355398, at *2 (N.D. Cal. Sept. 14, 2015). Sealing is also consistent with the approach the Court took in sealing names of Meta employees in the Personal Injury Plaintiffs’ Master Complaint and the multistate Attorney General Complaint. <i>See</i> Dkt. 189; Case No. 4:23-cv-05448-YGR, Dkt. 77. Sealing non-executive employee names is further warranted to protect the employee’s safety, as explained in the April 8, 2025 Declaration of Andre Suite (ECF 1850-1). <i>Cf. Campbell v. Grounds</i> 2022 WL 14151744, at *1 (N.D. Cal. Oct. 24, 2022) (sealing witness name and finding standard met when disclosure “could put at risk the safety of one or more individuals if made public”).	
Exhibit A-1 to Simonsen Declaration, Declaration of Sam Yang in Response to December 17, 2025 Order re Further Information re Meta’s	N/A (no requested redactions)	N/A (no requested redactions)	N/A (no requested redactions)

Motion for Protective Order (ECF 2594-2)			
Exhibit A-2 to Simonsen Declaration, Excerpts of Deposition Transcript of F.K.S. (ECF 2594-3)	Name of non-executive employee (appearing at location of redactions in version of filing attached to Proposed Order filed herewith)	See stated basis above.	See prior sealing orders above.
Exhibit A-3 to Simonsen Declaration, Excerpts of Deposition Transcript of A.D. (ECF 2594-4)	Name of non-executive employee (appearing at location of redactions in version of filing attached to Proposed Order filed herewith)	See stated basis above.	See prior sealing orders above.
Exhibit A-4 to Simonsen Declaration, Meta Defendants' Responses & Objections to Plaintiffs' Sixth Set of Requests for Production of Documents (ECF 2594-5)	N/A (not filed provisionally under seal)	N/A (not filed provisionally under seal)	N/A (no requested redactions)
Order re Further Information re Meta's Motion for Protective Order (ECF 2581) (Sealed)	Names of non-executive employees (appearing at location of redactions in version of filing attached to Proposed Order filed herewith)	See stated basis above.	See prior sealing orders above.

**IT IS SO STIPULATED AND AGREED.**

DATED: December 22, 2025

Respectfully submitted,

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**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 22, 2025

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen